I'm writing in support of WISPA's Common Ground proposal, and specifically the "Licensed-Lite" approach. The WISPA proposal approach enables the immediate use of TV Whitespace for the expansion of Broadband services, without any negative side effects or interference to the pre-existing incumbent users of the band, to include TV Broadcasters and Wireless Microphone users. For this reason, I urge the FCC to allocate the use of TV Whitespace under these proposed rules, on November 4th or the soonest possible viable date, so that with no further delay, WISPs across the country can immeidately continue to do what they do best, provide Broadband to the underserved Americans in need.

RapidDSL is a local privately owned Wireless Internet Service Provider, serving the Washington DC Metropolitan areas, to include many of Maryland's and Northern Virginia's underserved rural areas and agricultural reserves, since year 2001. We have personally invested over a million dollars towards the deployment of Broadband in our local communities, to serve the many residents and small businesses in dire need. But WISPs can't do it alone, with just hard work. We still face a large barrier, preventing us from serving many underserved Americans, and its the lack of available spectrum below 1Ghz, which is uniquely capable to penetrate dense foliage and trees. TV Whitespace offers the only viable solution left to solve this problem. Provided that TV Whitespace is allocated for use in a way that minimizes interference, and promotes cooperation to resolve interference.

In our years deploying broadband, one thing we learned is that consumers are not satisfied with marginal half reliable broadband. Once they get it, they quickly come to heavilly rely on it for their daily routines. One of the challenges for WISPs, is to be able to promptly solve reliabilty issues, often caused by interference. Using Unlicensed Line-of-sight technologies, it had proven to be very difficult to isolate the location of interference to solve it quickly. We would anticipate this to be a much larger problem, with TV Whitespace, which is Non-Line-of-sight in nature, and can hear signals over much larger distances. For this reason, it is impairative that a "Licensed-Lite" approach is adopted for high power users and providers to register their

Base Station locations and contact information, to enable faster interference resolution.

It is extremely important that the FCC choses a "non-exclusive" licensing method such as "Licensed-Lite" so that local providers will be guaranteed to have access to the TV Whitespace, as it is the Local providers that have inside knowledge and vested interest in identifying the local underserved areas within their communities. As well, it creates diversity in Media Ownership, which is impairative for an Open Internet and national security.

However, I do have two concerns. One is that many needy underserved areas near Tier1 East Coast cities could be left empty handed, without adequate Whitespace use, to serve consumers. In Central and Western USA, this is not an issue, as there will be many vacant non-adjacent Whitespace channels available for use there. However, in areas like Maryland, without the use of adjacent channels, there may not be more than 1 or 2 free usable channels at best for WISPs' use. There are isolated heavilly hilled and treed areas, such as the Agricultural Reserves, that are very needy for TV Whitespace spectrum, which with careful engineering by WISP professionals could potentially be served utilizing adjacent TV Whitespace channels without causing harmful interference to Broadcasters and Microphone users. I would like the FCC to keep open public comment, to discuss possibilties for future ways WISPs could gain special permission, under licensed-lite rules, to utilize a portion of adjacent channels, in areas where there was not a minimum reasonable amount of non-adjacent channels options available, provided the WISPs could demonstrate need, and that they could deploy in a way not to interfere with incumbent licensees, using such techniques as filtering, Hillside and forest isolation, directional antennas, lowering power, etc.

The second Concern is, I'd like to avoid allowing licensees to combine a large number of channels togeather for a single link, monopolizing the spectrum use in an area. I'd like to propose that the FCC limit the channel width, or combined channels width, to no more than 10Mhz or 20Mhz per licensed link, preferably 10Mhz in areas where available spectrum is limited.